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November 20, 1995

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Re: *CC Docket No. 95-155, Toll Free Service Access Codes*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

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List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Toll Free Service Access Codes

CC Docket No. 95-155

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

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CC Docket No. 95-155

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

A. INTRODUCTION

Pacific Bell and Nevada Bell ("Pacific") hereby submit reply comments with regard to the transition to the 888 Toll Free Access Code. The commenters raised several issues that we believe deserve comment. They relate to the following topics: whether parties reserving numbers should pay deposits into escrow; whether Mechanized Generic Interface ("MGI") may be used to reserve numbers; whether the Industry Guidelines should be codified; whether RespOrgs can meet the proposed access time standards; phase-in of the 888 code; reports furnished to the FCC; public awareness campaigns; the requirement of an affirmative request for toll free service and a two year record retention period for such requests; planning for new codes; a cap on number reservations; penalties; vanity numbers; high and low volume numbers; exogenous treatment for 888 implementation costs; toll free pricing; a trigger for beginning the planning process for a new access code; certification requirements; software licensing from

DSMI; Bellcore's and the LEC's datalinks; and a February 1997 deadline for installation of all 8XX toll free access codes.

B. DISCUSSION

1. Escrow Payments/Deposits

Several commenters support requiring RespOrgs reserving numbers to pay deposits into an escrow account. We oppose such a provision. It disadvantages small RespOrgs and probably will not deter those bent on hoarding numbers. Instead, we propose a hard and fast rule requiring an affirmative request for toll free service before a RespOrg may assign a number.

2. Use of Mechanized Generic Interface ("MGI")

Some commenters propose banning the use of MGI. While we agree that MGI, if used with malicious intent, can be used to corner the market quickly on all numbers in a particular NXX code, we believe MGI also has benefits that should not be eliminated. For example, MGI allows a RespOrg to search for a particular number desired by a customer quickly and at low cost. Moreover, MGI is accessible to anyone with a PC, and PCs are not the sole province of large RespOrgs. If the Commission is to limit the use of MGI, we propose that it do so only with regard to the instantaneous mass reservation of thousands or tens of thousands of numbers in a short period of time. Such misuse of MGI occurred with regard to the 800-555 NXX code, and should be prohibited in the future. However, we do not support a 60-second lockout that would effectively make MGI use impossible, but rather advocate a 45-day implementation period for 888. (See Section 5, below.)

3. Codification of Industry Guidelines

We proposed in our opening Comments that the existing Industry Guidelines (“Guidelines”) be codified. Several parties stated that they should remain voluntary. Because the Guidelines, if followed, prohibit the assignment of numbers without an affirmative customer request, and otherwise provide effective means of deterring warehousing, we continue to believe that the Guidelines should be codified or otherwise written into the FCC’s rules.

4. Access Time Standards

We can meet the access time standards the Commission proposes. However, we express no opinion as to the appropriateness of the standards for RespOrgs using tandems or those small RespOrgs still using electromechanical switches.

5. Phase In Of 888

We support those commenters who propose a 45-day phase-in of the 888 access code. We understand that DSMI can only download 100,000 records per day and that the system will crash if it is overloaded. We believe a 45-day phase-in period is the only way to prevent the mass disorganization which would be caused by overloading the computer system. On the other hand, we do not agree that a one time implementation process necessitates a requirement that Bellcore and the LEC’s update their datalinks, as MCI proposes.¹

6. Reports to the FCC

Several companies propose that the Commission be furnished a variety of reports on toll free number usage, some prepared by DSMI and others by the RespOrgs themselves. We believe the most efficient reporting mechanism would be to have DSMI make quarterly reports.

¹ MCI’s comments, at 12-14.

We have no objection to DSMI making these reports on a RespOrg-by-RespOrg basis, and also show overall number consumption. The reports should not contain information identifying customers, but rather should be gathered from information currently considered non-proprietary. We do not believe each individual RespOrg should be required to submit usage reports to the FCC.

7. Public Awareness

While some commenters propose a collaborative industry-wide public awareness campaign, we remain convinced that the competitive nature of toll free service will provide incentives to RespOrgs to advertise the new access code. This advertising will make a Commission-ordered public awareness campaign unnecessary. Moreover, we do not see the transition from 800 to 888 as an issue raising such high levels of customer confusion as to require a Commission-ordered response.

8. Requirement of Affirmative Request from Customer; Record Retention

Some commenters supported the Commission's proposed two-year record retention proposal for records of customers' affirmative request for 800 service. We wholeheartedly support a requirement that requires an affirmative request from customers before a RespOrgs may assign an 800 number. However, we do not support having to create a new record to reflect this request, and a two-year retention period for the new record.

We receive customers' requests over the telephone, and confirm those requests in a written confirmation letter we are required by the California Public Utilities Commission to send to our customers. We then set up billing arrangements for the toll free service. The combination of the oral customer request, the written confirmation letter from us to the customer, and the issuance of the monthly billing for toll free access service, constitute what we contend is

sufficient written confirmation of the customer's request. We oppose any requirement that we deviate from this process. We do maintain billing records for a certain period of time on microfiche, but the best source of information confirming a customer's affirmative request for service is the customer him or herself, not a new record.

Moreover, we do not agree that the customer must sign a request in order for it to constitute an affirmative request for a toll free number. We take orders over the telephone from our customers, and should be able to continue to rely on our customers' word that they want service. We do not require a written request for other types of telephone service, and see no reason to require our customers to incur the delay caused by mailing a request for toll free service.

9. Planning For New Codes

Not surprisingly, the interexchange carriers which filed comments believe that it is a simple matter to implement a new toll free access code, and that the Commission should impose a 6-month limit on this process. We disagree. We have not yet been furnished the software and hardware necessary to implement toll free access codes after 888. We oppose any set period of time within which we must deploy a new code; we prefer a trigger point of 50% exhaust of the existing code, at which time the industry will meet and begin to plan the implementation of the next code. We currently estimate that it takes us 22 months to implement an area code split from a systems perspective, and we have no reason to believe that period is shorter in the toll free arena.

10. Cap on Numbers Reserved

Several parties proposed a cap on the numbers a RespOrg may reserve, calculated as a percentage of that RespOrg's assigned numbers in "working" status. We agree that some

cap should be implemented, but do not agree that it should be below 10%, as some propose. We support continuation of the 15% cap currently in operation. We support combining this percentage cap with an outside numerical limit on the amount of numbers a RespOrg may reserve in a given week so that RespOrgs with a large quantity of numbers in “working” status are not allowed to perpetuate their high market share indefinitely.

11. Penalties

Several parties proposed that the Commission implement penalties for warehousing, consisting of decertification as a RespOrg, fines and additional reporting requirements. We urge a wait-and-see approach until the FCC has the results of its audit of the 800 access code depletion.² Until the FCC determines that RespOrgs have engaged in wrongdoing, it is premature to prescribe new penalties. Finally, if the Commission decides to implement penalties, they should only be used where a RespOrg is shown to have engaged in intentional misconduct.

12. Vanity Numbers

Not surprisingly, the comments were divided as to the appropriateness of vanity numbers. We cannot stress enough how inappropriate it would be to adopt a vanity number scheme. If one operates from the premise that customers have no ownership interest in their numbers, as the FCC concedes, then one must conclude that the FCC has no authority to order the implementation of vanity numbers. We see no room for compromise in this area. Our worst fears were confirmed by one commenter (Charter Medical Corporation), which stated that vanity

² MCI’s statement that there is no proof of warehousing of numbers is premature given that the FCC’s audit has not been completed. Id. at 8-10.

codes should not only be applied in the toll free area, but should be extended to all other area codes. This is precisely the slippery slope down which the FCC should not force the industry. We urge the FCC to draw a bright line on this issue, and allow only a first come, first served approach to the assignment of toll free numbers.

Moreover, the proposal that a certain percentage of numbers be duplicated in the 888 code would cause even greater customer confusion than allowing no duplication. Customers would assume all numbers had been duplicated, rather than only 15% of them as AT&T proposes,³ resulting in a large volume of misdialed numbers. Finally, as SNET points out,⁴ granting a right of first refusal not only wastes a valuable resource, but also discriminates against those parties that do not have toll free numbers today.

13. High and Low Volume Numbers

The commenters made proposals with regard to numbers with both high and low volume usage which we believe deserve a response.

a. Low Usage Numbers

We agree that low usage numbers have merit, and that they should not be automatically taken away from a customer if a customer does not use them for a certain period of time. Such an approach hurts seasonal businesses and introduces administrative burdens. For example, we assume that we would have to notify our customers before we took away their no-usage toll free numbers. The burden of making these individual notifications, and the customer

³ See AT&T's comments, at 23-24.

⁴ SNET's comments, at 6.

dissatisfaction such action would cause, outweigh the benefits of imposing an automatic return policy.

On the other hand, we understand the concern in the minds of those who propose such a policy. Toll free numbers should not be given to customers who have not asked for them. For example, MCI advocates a position that assumes a customer has requested a number when that customer orders a package of services which includes 800 service.⁵ While we do not know the specifics of MCI's proposal, it seems to be a "constructive" standard that does not require an actual request, but interprets general behavior not focused on 800 service to be an equivalent of a request. We do not support such a standard. The remedy, however, is not automatic return of unused numbers, but a hard and fast rule requiring an affirmative, specific request for 800 service before a RespOrg may take a number from the system.

b. High Usage Numbers

With regard to high volume numbers and the risk of misdials for customers who receive the equivalent numbers in the 888 code, we do not support a Commission-mandated approach. The industry has always faced the problem of customers receiving a high number of misdialed calls, and has been able to work with its customers on a case-by-case basis to resolve the problem. We propose the same occur here, and that the Commission not adopt policies that would take high volume numbers out of service and deplete a valuable resource. We oppose any modification of the 800/SMS database to identify high volume toll free numbers so that they may be held out of the assignment process. Again, we believe the best way to deal with customers who are receiving large volumes of misdialed calls is on a case-by-case basis.

⁵ MCI comments, at 2-3.

14. Exogenous Treatment of Implementation Costs

We desire exogenous treatment of 888 implementation costs consistent with our request in connection with 800 service. We believe tandem upgrade costs and SSP costs -- as well as all other costs associated with the mandated deployment of toll free service -- should be included in the category of costs treated as exogenous.⁶

15. Toll Free Pricing

Several commenters sought FCC rulings on toll free pricing and customer record or storage fees. We believe those comments are beyond the scope of this proceeding.

16. Trigger Point

We agree that it would be appropriate to set a trigger point for the industry to begin planning the implementation of the next toll free access code. We suggest this planning begin when an existing code has been exhausted by 50%. We do not believe the Commission should mandate a schedule thereafter, but should simply provide that this trigger point should

⁶ The Commission has determined that certain costs incurred by the LECs caused by administrative, legislative or judicial requirements beyond their control should result in an adjustment to their price cap indices. Policy and Rules Concerning Rates for Dominant Carriers, 5 FCC Rcd 6786, 6807 (1990). The Commission allowed the LECs to treat as exogenous the reasonable costs they incurred for the implementation and operation of the basic 800 database service required by Commission orders. The Commission reasoned that because it effectively required the implementation of 800 service and dictated the terms, conditions, and schedule for offering it, the reasonable costs specific to implementing basic 800 database service were outside the LECs' control and therefore could be treated exogenously. Provision of Access for 800 Service, 8 FCC Rcd 907, 911 (1993).

In its recent review of the LEC price cap rules, the Commission reaffirmed that it would treat these 800 data base costs exogenously. Price Cap Performance Review for Local Exchange Carriers, 10 FCC Rcd 8961, ¶ 274, n.513. In the same order, the Commission determined that accounting changes would receive exogenous treatment only to the degree that they changed carriers' economic costs. *Id.*, ¶ 293. However, this rule change did not affect 800 database costs, both because they are not accounting changes, and because they are economic costs.

mark the beginning of discussions in industry fora of how to implement the next code, the hardware and software changes needed to do so, and the scheduling of implementation.

17. Certifications to the FCC

We do not believe RespOrgs should have to furnish written certifications to the FCC on a monthly or quarterly basis. We agree with Nextlink⁷ that “the Commission [should] revise its rule . . . to specifically state that the act of a RespOrg accessing the SMS database to withdraw a toll free number would constitute certification” that there is an actual customer request for the number.

18. Software Licensing

AT&T states that the RBOCs and Bellcore should be required to license, at commercially reasonable rates, to any new third party administrator the software that is required to continue the operation of SMS and the NASC.⁸ We absolutely disagree with this position, and dispute that the FCC has authority to require an entity to license its intellectual property to another entity at a particular price. Moreover, this comment is beyond the scope of this proceeding. To the extent AT&T seeks to remove DSMI as administrator of toll free numbering resources, that issue should be taken up elsewhere.

⁷ Nextlink’s comments, at 6.

⁸ AT&T’s comments, at 18-19.

19. February, 1997 Proposed Deadline for Installation of Codes

We disagree that the database administrator should have to make the investment now to ensure that all toll free access codes in the 8XX series are installed by February, 1997. Many companies agreed that setting an arbitrary deadline for installation of all 8XX codes makes no sense.⁹ We have no way to predict whether there will be a need for these additional access codes in the next 15 months, but it seems highly unlikely that all 8XX codes will be necessary. Moreover, as we stated in our opening comments, minutes of use for toll free service are not increasing enough to justify the huge infrastructure investment required to make way for 8XX codes that may never be necessary. The Commission should instead set a trigger point of 50% of exhaust of the current code, and mandate that at that point the industry begin discussing the transition to a new code.

C. CONCLUSION

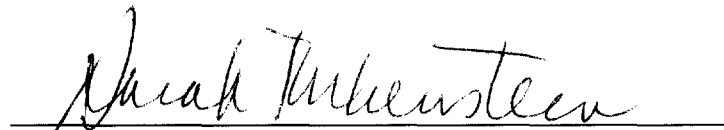
Pacific urges the Commission to resist the urge to over-regulate in the toll free access arena. The most important thing the Commission can do to prevent number depletion is to require an affirmative customer request for toll free service. On the other hand, the worst

⁹ See, e.g., Ameritech's comments, at 22-23; BellSouth's comments, at 11-12; Southwestern Bell's comments, at 14-15; US West's comments, at 16; GTE's comments, at 5.

thing the Commission could do would be to allow customers to duplicate their "vanity" numbers in new codes. We eagerly await the Commission's decisions.

Respectfully submitted,

PACIFIC BELL AND NEVADA BELL

A handwritten signature in cursive script, appearing to read "Sarah Rubenstein", is written over a horizontal line.

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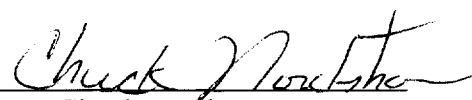
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Date: November 20, 1995

CERTIFICATE OF SERVICE

I, Chuck Nordstrom, hereby certify that copies of the foregoing "REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL" regarding CC Docket No. 95-155, were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached service list on this 20th day of November, 1995.

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